

The Court is in receipt of the letter filed in Case No. 23-cv-10393. The letter appears to be in reference to a different matter, No. 23-cv-10395. Accordingly, the Court will address the request for relief in that case.

United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007  
[23-cv-10393](#)

Re: Columbia University and Ms. Tenzer's Material Misrepresentations to the Court

Dear Judge Ho,

I write to bring to the Court's attention a serious matter concerning material misrepresentations made by Columbia University and its counsel, Ms. Tenzer, in their opposition to my motion for a preliminary injunction. Additionally, I request a Rule 26(f) conference to discuss the discovery plan and other critical aspects of the case.

### **I. Columbia's Misrepresentations and Bad Faith**

Columbia's Opposition Letter asserts that Mr. Neel Kachalia, the individual I accused of sexual assault, is not a current student and has no affiliation with Columbia University. This is demonstrably false. **Mr. Kachalia is currently pursuing a degree at Columbia University**, specifically a second bachelor's degree at the School of General Studies, with an expected graduation date of early 2025. He has an active columbia.edu email address and is registered as a student on Columbia's Morningside campus. This information directly contradicts Columbia's representations to the Court and is material to my case. Specifically, Columbia's misrepresentation is evident in the following misrepresentation to the Court from their Opposition Letter:

- "While Plaintiff discusses how he interviews Columbia applicants and wishes to attend alumni reunions "without fear," Letter at 1-2, he does not explain how his ability to engage in those activities would be harmed without Columbia immediately investigating his report of a 2014 assault **by a former, non-degree seeking student who is not an alumnus or member of Plaintiff's graduating class.**" (Opposition Letter at 3, emphasis added).

**These statements are blatantly false and misleading.** Mr. Kachalia is not a "former" student; **he is currently enrolled and actively present on Columbia's campus.** Furthermore, he is both an alumnus of the business school and currently pursuing a degree at Columbia (see **EXHIBIT 1**).

### **II. Contradictions in Columbia's Statements**

In private correspondence, Ms. Tenzer, on behalf of Columbia's Gender-Based Misconduct Office, informed me that Mr. Kachalia does not meet the Policy's definition of an active alumnus because he is neither a current student nor an active alumnus with an intention to participate in alumni activities (Attached Letter from G. Tenzer, **EXHIBIT 2**). However, this contradicts the fact that Mr. Kachalia is indeed an active alumnus, as evidenced by his registration for and

SO ORDERED.



Dale E. Ho  
United States District Judge  
Dated: October 10, 2024  
New York, New York

attendance at a Columbia Business School Alumni Club of New York event on June 13, 2024 during my alma mater's 2024 alumni reunion (**EXHIBIT 3**). This event participation clearly indicates his active involvement in alumni activities, which directly contradicts Ms. Tenzer's assertions to the Court. Here are the exact quotations from both the private letter and the Opposition Letter, highlighting the misrepresentations and contradictions:

**1. Private Letter:**

- "Although the Interim Title IX Policy applies in some circumstances to gender-based misconduct that affects active alumni, the Policy gives the Office authority to engage the disciplinary process to address such conduct only when alleged respondents are also current students or active alumni. Because Mr. Kachalia is neither a current student nor an active alumnus, your report does not fall within the Policy, and the disciplinary process will not be engaged by the Office in connection with your report." (Attached Letter from G. Tenzer)
- "As explained in more detail below, although you assert that you meet the Policy's definition of an active alum—that is, a graduate of a Columbia undergraduate or graduate degree-granting program (non-certificate program) with an intent to participate in one or more of Columbia's alumni-specific groups or associations, or a person who graduated from a Columbia undergraduate or graduate degree-granting program within the six months prior to reporting—Mr. Kachalia does not meet the Policy's definition of an active alum, nor is he a current student." (Attached Letter from G. Tenzer)

**2. Opposition Letter:**

- "Plaintiff's ability to engage in those activities would be harmed without Columbia immediately investigating his report of a 2014 assault by a former, non-degree seeking student who is not an alumnus or member of Plaintiff's graduating class." (Opposition Letter at 3)
- "he does not explain how his ability to engage in those activities would be harmed without Columbia immediately investigating his report of a 2014 assault by a former, non-degree seeking student who is not an alumnus or member of Plaintiff's graduating class." (Opposition Letter at 3)

These statements are directly contradictory, with the private letter admitting Mr. Kachalia is an alumnus but not an active alumnus with an intention to participate in alumni activities, while the Opposition Letter falsely claims he is a former non-degree seeking student who is not an alumnus. For two weeks, Ms. Tenzer has remained unresponsive by email and phone to my requests for clarification of my alma mater's position or to provide a contact at the University who can confirm her statements to me directly, with authority to respond to my report in accordance with federal and university Title IX policy.

I highlight the portion of Columbia's Gender-Based Misconduct policy (**Exhibit 4**) that explicitly applies to alumni complainants. Ms. Tenzer's assertions to the contrary are intentional misrepresentations to this Court.

**III. Columbia's Conduct is Unreasonable and Unconstitutional**

It has been more than 70 days since I reported the assault, and I have not received any communication from the Gender-Based Misconduct office at Columbia. Even by the standard cited by Columbia in its opposition (*Hayut v. State Univ. of N.Y.*, 352 F.3d 733, 751 (2d Cir. 2003)), their lengthy and unjustified delay, deliberate indifference and retaliatory conduct is unreasonable and unconstitutional. Further, that regulatory guidance cited is nearly one-quarter century old and is inapposite. Columbia's actions, including the delay in the investigation and the misrepresentations to the court, is an attempt to obstruct justice, deny me a fair and timely resolution, and protect an assailant who freely roams Columbia's campuses. This conduct is outrageous, particularly given Ms. Tenzer's 17 years of experience as an attorney. She should be well aware of her ethical obligations and the consequences of making misrepresentations to the court.

#### **IV. Impact on Claims**

The presence of Mr. Kachalia on campus significantly impacts my claims of irreparable harm and the need for a timely investigation. Mr. Kachalia, who is currently pursuing a degree at Columbia University and actively involved in alumni activities, is the same individual who, in 2014, spiked my drink with a date rape drug and sexually assaulted me in my dormitory. This traumatic event, which I only recalled through extensive therapy, underscores the ongoing risk and potential for further harm to myself and other students on Columbia's campuses. Kachalia's presence on campus and Columbia's failure to investigate exacerbates my emotional distress and creates a chilling effect on other survivors who may be hesitant to come forward.

This situation is particularly egregious given that, following reports from dozens of students and parents, Columbia was previously investigated by the Department of Education's Office of Civil Rights in 2014 for similar failures in addressing gender-based misconduct. Despite this, Columbia has not taken adequate steps to ensure a safe environment for its students and alumni or follow federal law. The ongoing risk posed by Mr. Kachalia's presence on campus necessitates immediate action to protect me, current students and the broader university community. Therefore, an injunction from a United States federal court is necessary to ensure that Columbia takes the necessary steps to prevent further harm.

#### **V. Request for Relief**

In light of the foregoing, I respectfully request that the Court:

1. **Acknowledge the Misrepresentation:** Formally recognize in the record that Columbia has made material misrepresentations to the Court.
2. **Adverse Inference:** Consider drawing an adverse inference against Columbia, recognizing that Mr. Kachalia's current enrollment status significantly impacts my claims of irreparable harm and the need for a timely investigation.
3. **Sanctions:** Impose appropriate sanctions on Columbia and/or its counsel, Ms. Tenzer, for their misconduct. Such sanctions may include monetary penalties, an order requiring Columbia to pay my legal fees and expenses incurred due to the misrepresentation, or any other relief the Court deems just and proper.

4. **Issue an Order:** Immediately issue an order for an injunction compelling the university to perform an intake and properly investigate my July 1, 2024 report, and to maintain oversight over the investigatory process until it is completed.

## **VI. Federal Causes of Action**

I plan to assert federal causes of action for Title IX failure to investigate, retaliation, deliberate indifference, and other relevant federal claims. Columbia's failure to investigate my report or even respond for two months, and their misrepresentations to the Court is a violation of public policy, federal and state law, and has exacerbated the harm I have suffered.

## **VII. Request for Rule 26(f) Conference**

Given the complexities and ongoing issues in this case, I request a Rule 26(f) conference to discuss the discovery plan and other critical aspects of the case. This conference will allow us to address several key issues:

- **Discovery Plan:** Develop a proposed discovery plan that includes the timing of written discovery, fact and expert discovery deadlines, and document production.
- **Preservation of Information:** Discuss any issues about preserving discoverable information, particularly electronically stored information.
- **Scope of Discovery:** Identify the subjects on which discovery may be needed and whether discovery should be conducted in phases or be limited to or focused on particular issues.
- **Due Process and Fairness Concerns:** Address any due process and fairness concerns related to the discovery process, ensuring that both parties have a fair opportunity to present their case.

Pursuant to Federal Rule of Civil Procedure 26(f), I request that the Court schedule this conference as soon as practicable, at least 21 days before any scheduling conference or the entry of a scheduling order under Rule 16(b).

## **VIII. Strengthening the Argument for Irreparable Harm and Timely Investigation**

The new information significantly bolsters my argument for irreparable harm and the need for a timely investigation in several ways:

1. **Ongoing Risk:** Knowing that the alleged perpetrator is currently a student on campus highlights the ongoing risk and potential for further harm. This creates a sense of urgency and underscores the need for immediate action to protect myself and potentially other students exposed to him.
2. **Emotional Distress:** The knowledge that the alleged perpetrator is actively present in the same environment where the assault occurred, and Columbia is actively protecting him, has exacerbated my emotional distress, anxiety, and fear particularly around engaging with alumni activities and continuing my work as a volunteer alumni interviewer and donor to Columbia College who has the right to attend alumni reunions and engage

with my alma mater in its various alumni programming and activities without fear. This further supports my claim of irreparable harm, as these emotional impacts are difficult to quantify and compensate for financially.

3. **Chilling Effect:** The presence of an alleged perpetrator on campus can create a chilling effect, discouraging other survivors from coming forward and reporting their own experiences. Mr. Kachalia, now back at Columbia for a third time, is a hazard to the safety and well-being of other students. A prompt investigation is not only the law, it sends a message to students, parents and faculty that the university takes such allegations seriously and is committed to creating a safe environment for all students.

Respectfully,

/s/ John Doe

Plaintiff Pro Se

# **EXHIBIT 1**

[Home \(/s/\)](#)[Groups](#)Directory (<https://community.alumni.columbia.edu/s/global-search/%40uri#t>All&sort=relevance>) | [Gmail \(/s/call/gmail\)](#)

Neel Kachalia

22BUS 25GS

25GS

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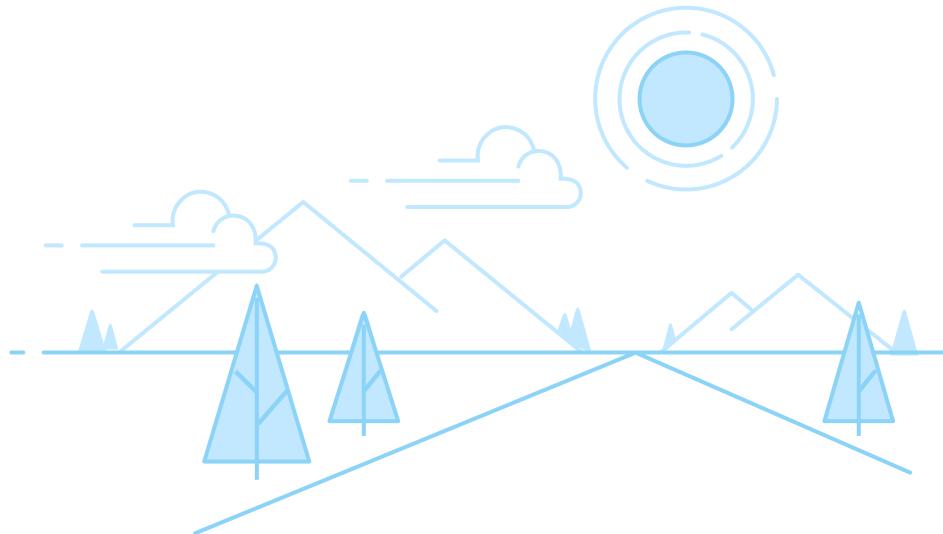
## Columbia Education

**Business** 2022

Institution: Columbia University  
Degree: MBA  
Major: Full Time MBA Program

## Other Education

[Student Activities](#)[Post](#)[Poll](#) Share an update...[Share](#) Search this feed...



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Here's where you start talking with your colleagues about this record.

#### About

The Columbia Alumni Association is a professional network, a social circle, access to faculty and fellow alumni, and a lifelong source of intellectual inspiration. Engage with your entire community here, wherever, whenever.

#### Contact

622 West 113th Street  
New York, New York 10025

Need Assistance? Contact Us  
[https://columbiaoad.tfaforms.net/87?  
tfa\\_4=005i0000007EeMOAA0](https://columbiaoad.tfaforms.net/87?tfa_4=005i0000007EeMOAA0)

(<https://www.facebook.com/ColumbiaAlumniAssoc>) (<http://twitter.com/ColumbiaAlumniA>) (<https://instagram.com/columbiaalumni>) (<https://www.linkedin.com/groups/55739/>) (<http://www.youtube.com/>)  
(<http://alumni.columbia.edu>)

#### Information

[CAA Homepage](https://alumni.columbia.edu/?utm_source=caa&utm_medium=community&utm_campaign=footer) ([https://alumni.columbia.edu/?utm\\_source=caa&utm\\_medium=community&utm\\_campaign=footer](https://alumni.columbia.edu/?utm_source=caa&utm_medium=community&utm_campaign=footer))

[FAQs](https://alumni.columbia.edu/content/alumni-community/frequently-asked-questions?utm_source=caa&utm_medium=community&utm_campaign=footer) ([https://alumni.columbia.edu/content/alumni-community/frequently-asked-questions?utm\\_source=caa&utm\\_medium=community&utm\\_campaign=footer](https://alumni.columbia.edu/content/alumni-community/frequently-asked-questions?utm_source=caa&utm_medium=community&utm_campaign=footer))

[Community Terms and Conditions](https://alumni.columbia.edu/content/alumni-community/terms-and-conditions?utm_source=caa&utm_medium=community&utm_campaign=footer)  
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[Your Benefits](https://alumni.columbia.edu/content/alumni-benefits-and-discounts?utm_source=caa&utm_medium=community&utm_campaign=footer) ([https://alumni.columbia.edu/content/alumni-benefits-and-discounts?utm\\_source=caa&utm\\_medium=community&utm\\_campaign=footer](https://alumni.columbia.edu/content/alumni-benefits-and-discounts?utm_source=caa&utm_medium=community&utm_campaign=footer))

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## **EXHIBIT 2**

# Hecker Fink LLP

350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT DIAL 929.294.2536

DIRECT EMAIL gtenzer@heckerfink.com

August 28, 2024

## VIA EMAIL



Dear Mr. [REDACTED]

On July 1, 2024 you submitted a report to Columbia University’s Gender-Based Misconduct Office (the “Office”) that in 2014, Neel Kachalia, who at the time was a non-degree seeking student at Columbia, engaged in conduct with you when you were a student at Columbia which may meet the definition of prohibited conduct under the [Gender-Based Misconduct and Interim Title IX Policies and Procedures for Students](#) (the “Policy”). After receiving your July 1 report, an initial assessment was conducted to evaluate whether the Office has authority, under the Policy, to engage the disciplinary process in response to your report. As explained in more detail below, although the Interim Title IX Policy applies in some circumstances to gender-based misconduct that affects active alumni, the Policy gives the Office authority to engage the disciplinary process to address such conduct only when alleged respondents are *also* current students or active alumni. **Because Mr. Kachalia is neither a current student nor an active alumnus, your report does not fall within the Policy, and the disciplinary process will not be engaged by the Office in connection with your report.**

The Interim Title IX Policy applies to gender-based misconduct that meets criteria set forth in the Policy, including that the conduct affects a current Columbia student *or active alum* and involves an allegation of misconduct committed by a current Columbia student *or active alum*. Although you assert that you meet the Policy’s definition of an active alum—that is, a graduate of a Columbia undergraduate or graduate degree-granting program (non-certificate program) with an intent to participate in one or more of Columbia’s alumni-specific groups or associations, or a person who graduated from a Columbia undergraduate or graduate degree-granting program within the six months prior to reporting<sup>1</sup>—**Mr. Kachalia does not meet the Policy’s definition of an active alum, nor is he a current student.** The Interim Title IX Policy therefore does not apply and cannot be invoked to address the conduct you reported to the Office. And because neither you nor Mr.

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<sup>1</sup> See Policy p.5.

# Hecker Fink LLP

2

Kachalia are currently students pursuing a degree from Columbia, the Gender-Based Misconduct Policy similarly does not apply.<sup>2</sup>

Based on the foregoing, it has been concluded that the Office does not have authority under the Policy to engage the disciplinary process in response to your report. Columbia is committed to fostering an environment that is free from gender-based discrimination and harassment, and takes reports of gender-based misconduct seriously. Although your report does not fall within the Policy and therefore will not be further investigated by the Office, the University strives to support students and others who report experiencing gender-based misconduct. Enclosed please find a list of resources that may be of assistance to you.

Sincerely,



Gabrielle E. Tenzer

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<sup>2</sup> See Policy p.6.

## OFF-CAMPUS RESOURCES\*\*

Unless otherwise noted, all facilities listed below are available 24 hours a day.

 indicates facilities that are not available 24 hours a day. \*\*Fees may apply.

### Off-Campus Advocacy, Counseling and Health Services

- **Safe Horizon**

Sexual Assault Hotline: 212-227-3000

Domestic Violence Hotline: 800-621-HOPE (4673)

-  **Mt. Sinai St. Luke's Hospital Crime Victims Treatment Center** 1-212-523-4728 *by appointment only* (sexual assault advocates available 24 hours a day).

- **New York-Presbyterian/CUIMC Emergency Room**

1-212-305-6204

- **New York City Anti-Violence Project**

1-212-714-1184

- **New York State Office of Victim Services** 1-800-247-8035

- **New York State Office of Campus Safety** 1-518-474-6460

- **New York State Office for the Prevention of Domestic Violence** 1-800-942-6906

- **It's On Us** 1-202-908-5226 [www.itsonus.org](http://www.itsonus.org)

### Neighboring Hospitals with SAFE Centers:

- **Mt. Sinai St. Luke's Hospital (CHP Group)**

1111 Amsterdam Avenue at West 113<sup>th</sup> Street

- **Mt. Sinai West Hospital (CHP Group)**

1000 10th Avenue at West 58<sup>th</sup> Street

- **Beth Israel-Petrie Campus (CHP Group)**

281 First Avenue at East 16<sup>th</sup> Street

- **Bellevue Hospital (HHC Group)**

462 First Avenue at East 27<sup>th</sup> Street

- **Harlem Hospital (HHC Group),**

506 Malcolm X Boulevard at West 135<sup>th</sup> Street

- **Metropolitan Hospital Center (HHC Group)**

1901 First Avenue at 96<sup>th</sup> Street

- **Mount Sinai Medical Center (Mount Sinai),**

1 Gustave L Levy Place (Fifth Avenue) at East 98<sup>th</sup> Street

- **New York-Presbyterian - Columbia (NYP)**

622 West 168<sup>th</sup> Street

- **New York-Presbyterian - The Allen Pavilion (NYP),**

5141 Broadway at West 221<sup>st</sup> Street

- **New York-Presbyterian - Weill Cornell (NYP),** 525 East 68<sup>th</sup> Street at York Avenue

Mt. Sinai St. Luke's Hospital's Emergency Room at 1111 Amsterdam Avenue (West 113<sup>th</sup> Street between Amsterdam and Morningside Avenues) and New York-Presbyterian Hospital/CUIMC Emergency Room at 630 West 168<sup>th</sup> Street (at Broadway) can provide treatment for injuries and for potential exposure to sexually transmitted infections, emergency contraception, and other health services. They can assist in preserving evidence or documenting any injuries and have personnel who are specially trained to collect evidence.

### Off-Campus Law Enforcement

- **New York City Police Department (NYPD)**

Emergency: 911

26th Precinct: 212-678-1311

- **New York County District Attorney's Office**

Domestic Violence Unit: 212-335-4308

Sex Crimes Unit: 212-335-9373

- **New York Campus Sexual Assault Victims Unit**

Hotline 1-844-845-7269

- **Sex Crimes Report Hotline** 212-267-7273

### Additional Government Resources

The government resources listed here may provide additional assistance for students wishing to file an external complaint of gender-based misconduct or students with inquiries regarding the application of Title IX and its implementing regulations:

-  **NYC Family Justice Center – Manhattan**

<https://www1.nyc.gov/site/ocdv/programs/family-justice-centers.page>

212-602-2800 | 80 Centre St New York, NY 10013

-  **New York State Office of Victims Services**

<https://ovs.ny.gov/> | 1-800-247-8035

-  **U.S. Department of Education, Office for Civil Rights** | <http://www.ed.gov/ocr>

646-428-3800 | New York – Region II, 32 Old Slip, 26<sup>th</sup> Floor | [OCR.NewYork@ed.gov](mailto:OCR.NewYork@ed.gov)

-  **U.S. Department of Justice, Office on Violence Against Women** | <https://www.justice.gov/ovw>

202-307-6026 | 145 N St, NE, Suite 10W.121 Washington, D.C. 20530

- **National Domestic Violence Hotline**

1-800-799-SAFE

-  **National Crime Victim Center**

<http://www.ncvc.org> | 855-484-2846 (8:30 am – 7:30 pm)

### Overseas Services

In an emergency, contact the nearest U.S. Embassy or Consulate, or call these numbers:

- From Canada: 1-888-407-4747

- From Overseas: +1-202-501-4444-4747

See the chart on the following page for an explanation of these resources' reporting obligations.

Up-to-date contact information can be found on the University's *Sexual Respect* website at <http://sexualrespect.columbia.edu>.

# **EXHIBIT 3**



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## AI-DRIVEN NARRATIVE CONFLICT AND MISINFORMATION: A WORKSHOP FOR CORPORATE LEADERS

[View Registrations \(/events/RSVPlist.aspx?id=1860574\)](#) [Tell a Friend \(/members/send.asp?event=1860574\)](#)

A Workshop for Corporate Lead

**6/13/2024**

**When:** **Thursday June 13, 2024**  
**6 - 8:30 pm**

**Where:** Betaworks  
 29 Little West 12th Street  
 New York, New York 10014  
 United States

**Contact:** Admin  
[info@cbsacny.org](mailto:info@cbsacny.org) (<mailto:info@cbsacny.org>)

*Online registration is closed.*

- View the 24 people who have already registered [\(/events/RSVPlist.aspx?id=1860574\)](#)

[« Go to Upcoming Event List \(/events/event\\_list.asp\)](#)

### AI-Driven Narrative Conflict and Misinformation

#### A Workshop for Corporate Leaders

Misinformation is one of the top risks for global leaders this year, as narratives used as weapons could disrupt elections worldwide, according to the World Economic Forum. These threats also pose a significant danger to businesses, with top companies and brands seeing material impact. While misinformation is not a new problem for society, artificial intelligence, generative AI and social media are accelerating the chaos it causes with unprecedented speed and impact, normalizing polarization and divisiveness.

As a leader, it is crucial to understand how to mitigate the impact of these increasingly pervasive online attacks. We invite you to join our upcoming

session, where **Chris Perry**, Chair, Futures at Weber Shandwick, **Wasim Khaled**, CEO of Blackbird.AI, and Columbia Business School Professor **Andrey Simonov** will discuss the methods, actors, and cases that highlight this challenge and provide insights on how to better prepare for them. Professor Simonov will speak also on the art of persuasion through AI.

Chris and Wasim have been at the forefront of combating fake news and the rise of mis- and disinformation, as well as helping corporations improve their preparedness since 2016. Perry recently published a book, ***Perspective Agents: A Human Guide to the Autonomous Age*** (<https://www.perspectiveagents.com/>), which investigates the implications of algorithms and AI on business planning, leadership, and resilience.

*Light refreshments and wine will be served*

**DATE/TIME:** Thursday, June 13, 2024 6:00pm - 8:30pm ET

**LOCATION:** Betaworks, 29 West Little 12th St., NYC

**FEE:** \$25 for CBSACNY members; \$35 for non members. **Absolutely no walk ins! Only those pre-registered will be admitted by the building's security.**

**JOIN THE CBS ALUMNI CLUB:** Get ONE FREE EVENT (including this one) with your new (\$85 or more) membership. Click here to join now (<https://www.cbsacny.org/page/joinnow>) and then contact us (<mailto:info@cbsacny.org>) to receive your promotional code before you register (sports, tours, tastings, etc., excluded).

#### SPEAKERS:



**Chris Perry** is the Chair of Futures at Weber Shandwick, a leading global communications consultancy. Drawing on more than twenty-five years of digital and media experience, Perry helps global business leaders decode technology, media, and culture, translating trends into commercial opportunities. He is a sought-after thought leader who speaks regularly at industry events, including Web Summit, Collision, SXSW, Fast Company's Innovation Festival, Advertising Week, and Digital Age Brazil. His writing and work have been featured in Forbes, Fortune, The New York Times, Washington Post, Ad Age, and Strategy + Business. Chris has guest lectured at Clemson, Columbia, Northwestern, NYU, and the University of Wisconsin, and he is the lead instructor for the agency's global Media Genius Fellows student program. Chris' first book, *Perspective Agents: A Human Guide to the Autonomous Age*, (<https://www.perspectiveagents.com/>) was published by Fast Company Press in January 2024.



**Wasim Khaled** is the CEO and Co-Founder of Blackbird.AI, an AI-driven Risk and narrative intelligence platform dedicated to leading the global fight against disinformation and narrative attacks. A computer scientist by trade, Khaled has extensively studied information operations, computational propaganda, behavioral science, artificial intelligence, and their applications in defense, cyber, and risk intelligence. He has consulted and advised government agencies and Fortune 500 companies on the risks and mitigation strategies of escalating information warfare. He is a member of the Social Intelligence Lab, the Weber Shandwick Collective, and the U.S. Department of State's Global Engagement Center. His work and insights have been featured in TechCrunch, WIRED, The New York Times, Bloomberg, Fortune, NPR, and NASDAQ. Before founding Blackbird.AI, he established LuxMobile, an Inc. 500 Fastest Growing Company in America, and was recognized as the Inc. 500 Asian Entrepreneur of the Year.



**Andrey Simonov** is the Gary Winnick and Martin Granoff Associate Professor of Business at Columbia Business School, an affiliate faculty member in the Department of Economics of Columbia University, and a Research Affiliate of the Centre for Economic Policy Research (CEPR). In the 2022-2023 academic year, I was visiting Hoover Institution at Stanford University as a Glenn Campbell and Rita Ricardo-Campbell National Fellow. His research work is in the areas of quantitative marketing, empirical industrial organization, and political economy, and focuses on digital and media markets, such as news, advertising, and video games.

**Thanks to CBS Alumni Club Board member Wendy Diller for coordinating this event, and special thanks to Chris Perry for organizing the panel. The Club also thanks Weber Shandwick for sponsoring.**

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## AI-DRIVEN NARRATIVE CONFLICT AND MISINFORMATION: A WORKSHOP FOR CORPORATE LEADERS

[Event Details \(/events/EventDetails.aspx?id=1860574\)](#)

### Registration List: AI-Driven Narrative Conflict and Misinformation: A Workshop for Corporate Leaders

**Carolyn Amato** ([/members/?id=76368852](#))

Edwards Lifesciences

RSVP Comments: N/A

Attending: Yes

**Claire Anderson** ([/members/?id=41718691](#))

GTI

RSVP Comments: N/A

Attending: Yes

**Christopher Bell** ([/members/?id=73842107](#))

C3 AI

RSVP Comments: N/A

Attending: Yes

**Tabber Benedict** ([/members/?id=76348314](#))

Footura Inc.

RSVP Comments: N/A

Attending: Yes

**Loren Busby** ([/members/?id=76408145](#))

Weill Cornell Medicine

RSVP Comments: N/A

Attending: Yes

**Karina Dadashov** ([/members/?id=72814316](#))

Procore

RSVP Comments: N/A

Attending: Yes

**Mohit Garg** ([/members/?id=69056051](#))

Advisory

RSVP Comments: N/A

Attending: Yes

**Gretchen Grant**  (/members/?id=58246431)

Intentful

RSVP Comments: N/A

Attending: Yes

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**Juanita Halim**  (/members/?id=73640888)

CIMB

RSVP Comments: N/A

Attending: Yes

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**Sabrina Hsueh**  (/members/?id=72768180)

Pfizer

RSVP Comments: N/A

Attending: Yes

---

**Bradley Jobling**  (/members/?id=40714320)

Omneky

RSVP Comments: N/A

Attending: Yes

---

**Neel Kachalia**  (/members/?id=75104775)

NA

RSVP Comments: N/A

Attending: Yes

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**Kathleen Maignan**  (/members/?id=74405298)

Genentech

RSVP Comments: N/A

Attending: Yes

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**Thomas Roberts**  (/members/?id=41719654)

self-employed

RSVP Comments: N/A

Attending: Yes

---

**Joseph Rogot**  (/members/?id=75873018)

Strategic Growth Advisory

RSVP Comments: N/A

Attending: Yes

---

**Kurt Ryden**  (/members/?id=75388905)

Bank of America Private Bank

RSVP Comments: N/A

Attending: Yes

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**Mayank Sharma**  (/members/?id=76392560)

EXL

RSVP Comments: N/A

Attending: Yes

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**Wonjoon Sohn**  (/members/?id=69612888)

N/A - in career transition

RSVP Comments: N/A

Attending: Yes

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**Christy Tanner**  (/members/?id=68776303)

Coraly Partners

RSVP Comments: N/A

Attending: Yes

**Lexy Tanner**  (/members/?id=63319147)

Tanner health and well

RSVP Comments: N/A

Attending: Yes

**Ivan Volodchenkov**  (/members/?id=76366513)

RFWilkins Consultants

RSVP Comments: N/A

Attending: Yes

**Jeffery Wu**  (/members/?id=69400003)

Meriti

RSVP Comments: N/A

Attending: Yes

**Danielle Young**  (/members/?id=41719009)

Bank of America - retired

RSVP Comments: N/A

Attending: Yes

**Jeffrey Zila**  (/members/?id=75135820)

US Marine Corps

RSVP Comments: N/A

Attending: Yes

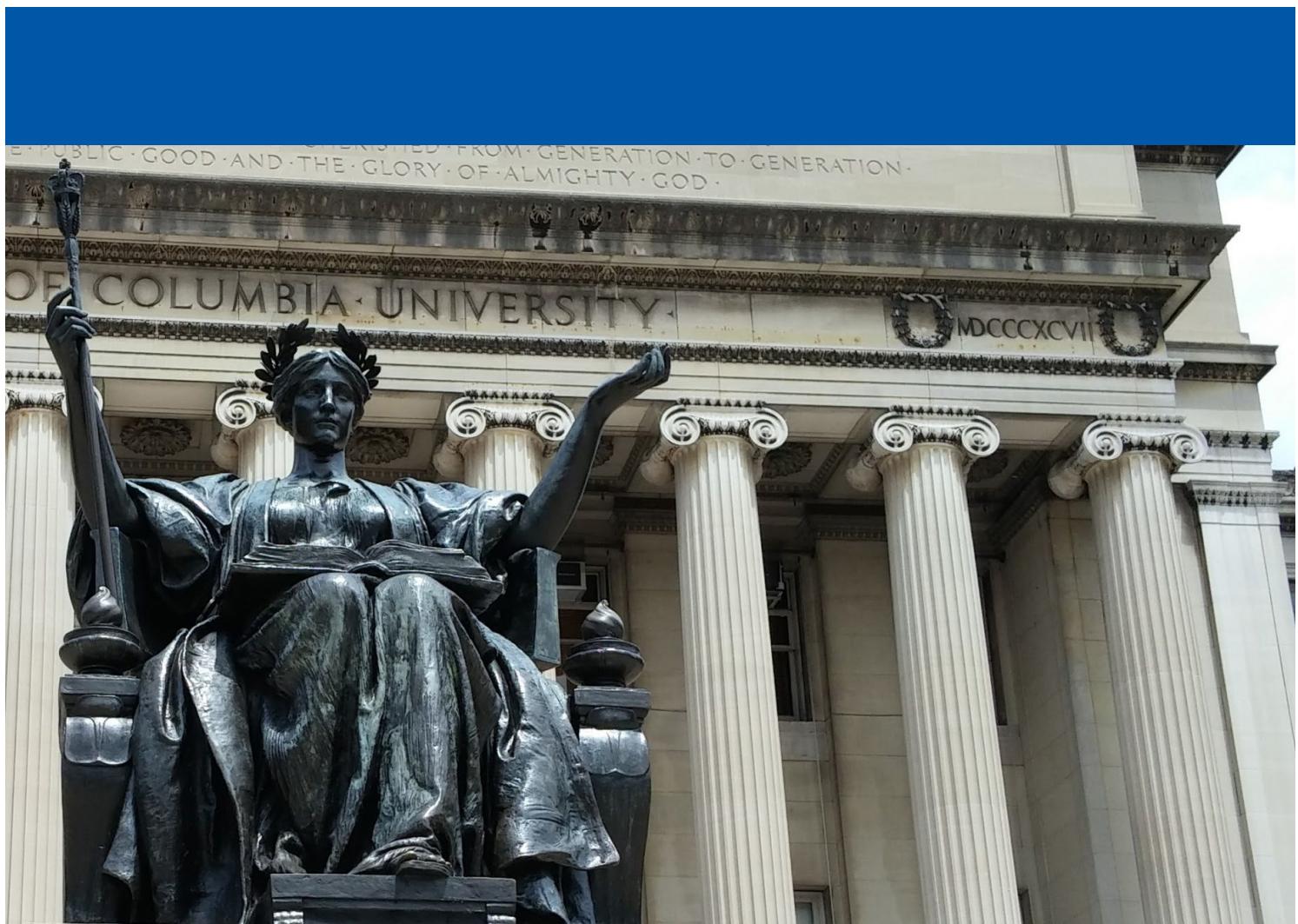


(<https://www.cbsacny.org/groups/120920/>)

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# **EXHIBIT 4**



# GENDER-BASED MISCONDUCT AND INTERIM TITLE IX POLICIES AND PROCEDURES FOR STUDENTS

GENDER-BASED MISCONDUCT OFFICE

*In loving memory of Alyssa Anzalone-Newman, Title IX Investigator  
Dates of Service: December 17, 2019 ~ June 6, 2022*

**GENDER-BASED MISCONDUCT AND  
INTERIM TITLE IX POLICIES AND PROCEDURES FOR STUDENTS  
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**Nothing in the Policies or Procedures set out here shall be construed to interfere with protected rights, including First Amendment and Due Process rights, as well as any other rights guaranteed against government action by the U.S. Constitution.**

**In addition, nothing in the Policies or the Procedures shall be construed to abridge academic freedom and inquiry, principles of free speech, or the University's educational mission.**

## II. SCOPE OF THE POLICIES AND PROCEDURES

This section describes the two policies and the circumstances in which each applies, and the scope of the procedures that accompany each Policy. Here, you can also find information about how to report gender-based misconduct. The following section provides definitions of gender-based misconduct.

### A. Interim Title IX Policy

The Interim Title IX Policy (“Title IX”) applies to gender-based misconduct that meets all the following criteria:

- Affects a current University student or active alum<sup>4</sup> (Complainant) and involves an allegation of misconduct committed by a current student or active alum (Respondent).
- Occurs: (1) on any University-owned property in the United States; (2) in connection with any University program, activity, or recognized student organization (including fraternities and sororities); or (3) in a location, at an event, or under circumstances over which

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<sup>4</sup> For the purposes of this Policy, an active alum is defined as a graduate of Columbia undergraduate or graduate degree-granting programs (non-certificate programs) with an intent to participate in one or more of Columbia’s alumni-specific groups or associations, or a person who graduated from a

Columbia undergraduate or graduate degree-granting program within the six months prior to reporting an allegation of misconduct to the University through the procedures outlined in this Policy. This definition applies to references to “alum” or “active alum” throughout this document.

the University exercises substantial control over the accused student or alum and the surrounding context (including field placements).

- Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the University's education program or activity (hostile environment sexual harassment);
- An employee conditioning educational benefits on participation in unwelcome sexual conduct (i.e., quid pro quo sexual harassment);
- Sexual assault (as defined in the Clery Act) (See Title IX, Section III/D, below);
- Dating violence (as defined in the Violence Against Women Act (VAWA) amendments to the Clery Act) (See Title IX, Section III/D, below);
- Domestic violence (as defined in the VAWA amendments to the Clery Act) (See Title IX, Section III/D, below);

- Stalking (as defined in the VAWA amendments to the Clery Act) (See Title IX, Section III/D, below).

## B. Gender-Based Misconduct Policy

The Gender-Based Misconduct Policy governs gender-based misconduct involving University students<sup>5</sup> that:

- occurs on any University campus or in connection with University programs or activities;
- creates a hostile environment for University students; or
- involves an accused person who is a current undergraduate, graduate, or professional school student at the University.

Distinct from the Interim Title IX Policy, the Gender-Based Misconduct Policy applies to alleged misconduct that occurs off campus, including outside of the United States; involves Complainants who are unaffiliated with the University; or sexual harassment (hostile educational/work environment), even if the conduct would not be considered "severe,

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<sup>5</sup> For the purposes of this Policy, a student is defined as any person pursuing a degree from the University, or who has an academic relationship with the University starting from the time of application and including those who are not officially enrolled for a particular semester.

For information about policies applicable to elementary and secondary school students enrolled in University programs, and other information regarding minors on Columbia's campus please visit:

<https://universitypolicies.columbia.edu/content/protection-and-treatment-minors-columbia-university#:~:text=Policy%20Statement&text=Any%20member%20of%20the%20University.could%20be%20responsible%20for%20abuse.>

For information regarding minors on Teachers College's campus please visit:  
<http://www.tc.columbia.edu/policylibrary/public-safety/minors--policies-and-guidelines-for-the-supervision-of-minor-children-on-campus>.